

Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON; and,  
STATE OF OREGON,

Plaintiffs,

vs.

DONALD TRUMP, et. al.,

Defendants.

No. 2:25-cv-00602-JHC

BRIEF OF AMICUS CURIAE  
NATIONAL VOTE AT HOME  
INSTITUTE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT

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**TABLE OF CONTENTS**

**I. STATEMENT OF INTEREST .....3**

**II. SECTION 7(A) OF THE EO WOULD DISENFRANCHISE VOTERS .....3**

    A. Mail Ballots Are Secure and Convenient Way to Vote.....4

    B. An Election Day Received-by Deadline Would Increase Disenfranchisement .....8

**III. CONCLUSION .....11**

## TABLE OF AUTHORITIES

STATUTES

|                                      |   |
|--------------------------------------|---|
| 50 U.S.C. §§ 301-303 (repealed)----- | 4 |
| 52 U.S.C. §§ 20301-20311-----        | 4 |
| ORS 254.470(6)(e). -----             | 9 |
| RCW 29A.40.110. -----                | 8 |
| RCW 29A.40.170(2)-----               | 9 |

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| Lisa Danetz, <i>Mail Ballot Sec. Features: A Primer</i> , Oct. 16, 2020, <a href="https://www.brennancenter.org/our-work/research-reports/mail-ballot-security-features-primer">https://www.brennancenter.org/our-work/research-reports/mail-ballot-security-features-primer</a> (and citations therein). -----   | 8      |
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## I. STATEMENT OF INTEREST

The National Vote at Home Institute (“NVAHI”) is nonpartisan, nonprofit organization that works to increase voters’ access to, use of, and confidence in vote at home systems in which ballots are mailed to voters and voters return them by mail, drop box, or directly to an election office. NVAHI’s vision is a secure nationwide, universal vote at home election system. To that end, NVAHI’s goals include providing high quality research on the impacts of voting at home, including turnout, accessibility, and best practices. It uses this research to educate and partner with state and national organizations about the benefits of voting at home, promote best practices for voting at home, and expand voter access. NVAHI’s deep research regarding voting at home shows that such voting programs increase access to voting with no appreciable partisan impact.

NVAHI submits this amicus brief in support of Plaintiffs’ Motion for Partial Summary Judgment (Dkt. 37) asking the Court to declare Section 7(a) of Executive Order No. 14248, 90 Fed. Reg. 14005 (Mar. 25, 2025) (entitled “Preserving and Protecting the Integrity of American Elections”) (the “EO”) unconstitutional. Section 7(a) of the EO would require mail-in ballots to be received by Election Day rather than postmarked on that day. Section 7(a) would contradict years of allowing at-home voters to vote on Election Day and risk disenfranchisement of voters who rely on mailing their ballots but have no control over the speed of mail delivery.

## II. SECTION 7(A) OF THE EO WOULD DISENFRANCHISE VOTERS

Designed with convenience and security in mind, vote at home systems are being increasingly used by all states and embraced by voters. Recent research shows that access to voting at home increases voter participation with no appreciable partisan impact, and that

1 voting by mail has resulted in de-minimis allegations of fraud. But implementing a mandatory  
 2 Election Day deadline for mail ballots, as Section 7(a) purports to do, would undoubtedly  
 3 disenfranchise many voters, giving at-home voters less time to vote and putting the fate of their  
 4 ballot into the hands the United States Postal Service (“USPS”), which itself admits is  
 5 becoming less reliable and slower, particularly for rural voters. For these reasons and as  
 6 discussed below, NVAHI asks the Court to grant Plaintiffs’ Motion for Partial Summary  
 7 Judgment.  
 8

9 **A. Mail Ballots Are Secure and Convenient Way to Vote**

10 American voters have used mail ballots for more than 150 years—starting, as noted in  
 11 Plaintiff’s Motion, during the Civil War, when Union and Confederate soldiers were allowed  
 12 to cast ballots from their battlefield units and have them counted back home.<sup>1</sup> During World  
 13 War II, Congress enacted legislation allowing mailed ballots for soldiers stationed overseas.<sup>2</sup>  
 14 Subsequent laws, particularly the Uniformed and Overseas Citizens Absentee Voting Act  
 15 (“UOCAVA”) and the Military and Overseas Voter Empowerment Act (the “MOVE Act”)  
 16 have enabled and encouraged voting by active service members through absentee voting.<sup>3</sup>  
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18 States began passing absentee ballot laws for civilians in the early 20<sup>th</sup> century. The  
 19 first laws were generally intended to accommodate voters who were infirm or ill on Election  
 20 Day, with laws in the later part of the 20<sup>th</sup> century expanding to offer absentee voting for other  
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 23 <sup>1</sup> Pl’s Mot. for Part. Summ. J. 17; Paul Gronke, et.al., *Vote by Mail in the U.S. Best Practices & New*  
 24 *Areas for Research*, 4-5, last updated July 16, 2025,  
<https://electionlab.mit.edu/research/projects/mapping-election-science/white-papers/vote-by-mail>.

25 <sup>2</sup> 50 U.S.C. §§ 301-303 (repealed); Coleman, Kevin J., Cong. R. Serv. *The Uniformed and Overseas*  
 26 *Citizens Absentee Voting Act: Overview and Issues*, (CRS Report No. RS20764), Oct. 16, 2016, 1.

<sup>3</sup> 52 U.S.C. §§ 20301-20311; *see also* Coleman at 1-5.

1 categories of citizens, such as disabled voters and college students who were away from  
 2 home.<sup>4</sup> In 1978, California passed the first “no-excuse” absentee ballot law and became the  
 3 first state to allow eligible voters to request absentee ballots for any reason, followed quickly  
 4 by Oregon and Washington.<sup>5</sup> Many other states followed suit, with close to half of the states  
 5 adopting some form of “no excuse” absentee voting, including non-precinct place voting,  
 6 voting by mail, or early in-person voting.<sup>6</sup>

8 In 1998, Oregon became the first state to authorize the issuance of all ballots by mail.<sup>7</sup>  
 9 Washington moved to voting entirely by mail in 2011, and Colorado in 2013.<sup>8</sup> More recently,  
 10 these states were joined by California, Hawaii, Utah, Nevada, Vermont, and Washington D.C.<sup>9</sup>  
 11 Twenty-nine states allow voters to request a mail ballot for any (or no) reason, with nine of  
 12 those states allowing voters to sign up to receive a mail ballot for every election, and 13 states  
 13 allow mail ballots with a specific excuse.<sup>10</sup>

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18 <sup>4</sup> Gronke at 4-5.

19 <sup>5</sup> Gronke at 5.

20 <sup>6</sup> *Id.*

21 <sup>7</sup> Oregon Secretary of State, *Vote by Mail*, 1, (last accessed Jul. 18, 2025).  
 22 <https://sos.oregon.gov/elections/Documents/statistics/vote-by-mail-timeline.pdf>.

23 <sup>8</sup> National Conference of State Legislatures, Table 18(a), *States That Conduct All Elections By Mail*,  
 24 (updated Oct. 11, 2024). <https://www.ncsl.org/elections-and-campaigns/table-18-states-with-all-mail-elections>.

25 <sup>9</sup> *Id.*

26 <sup>10</sup> Nat'l Vote at Home Inst., *How Americans Vote at Home Tool*, (last updated Jul.19, 2025)  
<https://voteathome.org/how-americans-vah/>.

1 In short, every state now allows mail ballots in some fashion, with each state (by their  
 2 constitutional right) determining the time, manner, and method of voting.<sup>11</sup> According to the  
 3 2022 Election Administration and Voting Survey (“EAVS”), 35,316,617 voters in the United  
 4 States participated in the 2022 federal general elections using mail.<sup>12</sup> NVAHI calculates that,  
 5 over the last 20 years, more than one billion ballots have been mailed to voters for voting at  
 6 home, across all 50 states and the District of Columbia, for presidential and midterm elections,  
 7 party primary races, special vacancy elections, and local elections.<sup>13</sup>

9 Years of widespread use across all states has confirmed that voting at home is secure,  
 10 convenient, widely used, and increases access to voting. At its core, voting by mail is a paper  
 11 ballot system, offering multiple safeguards, some of which are not available in all in-person  
 12 voting systems. While electronic voting machines have caused concerns for some people about  
 13 potential hacking, paper ballots enable elections officials to conduct risk-limiting audits to  
 14 ensure that votes have been accurately counted.<sup>14</sup> And vote at home systems use procedures  
 15 such as signature matching, bar codes, and ballot tracking to enhance security.<sup>15</sup>

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 20 <sup>11</sup> Elect. Comm’n and Ass’t. Comm’n, *Elect. Admin. and Voting Survey 2022 Compr. Rpt.*, 11, (Jun.  
 21 2023). [https://www.eac.gov/sites/default/files/2023-06/2022\\_EAVS\\_Report\\_508c.pdf](https://www.eac.gov/sites/default/files/2023-06/2022_EAVS_Report_508c.pdf)

22 <sup>12</sup> *Id.* at 12.

23 <sup>13</sup> Barbara Smith Warner, *Nat’l Vote at Home Inst. Press Rel.* (Mar. 15, 2023),  
 24 [https://voteathome.org/portfolio-tag/mail-ballot-  
 use/#:~:text=Over%20the%20last%2020%20years,or%20geography%20of%20each%20state.](https://voteathome.org/portfolio-tag/mail-ballot-use/#:~:text=Over%20the%20last%2020%20years,or%20geography%20of%20each%20state.)

25 <sup>14</sup> Nat’l Vote at Home Inst. *Vote at Home 2024 Pol’y and Rsch. Guide*, 24 (last updated Feb.24, 2024).

26 <sup>15</sup> *Id.*; Wendy R. Weiser and Harold Ekeh, *The False Narr. of Vote-by-Mail Fraud*, Apr. 10, 2020,  
<https://www.brennancenter.org/our-work/analysis-opinion/false-narrative-vote-mail-fraud>, and  
 citations therein.



1 These security and verification protocols have made cases of alleged voter fraud  
 2 involving mail ballots rare. For example, an analysis of the Heritage Foundation database  
 3 cataloging election fraud found that 0.00006 percent of roughly 250 million mail ballots over  
 4 a 20-year period involved fraud.<sup>16</sup>

5  
 6 Unsurprisingly, voters are increasingly embracing voting at home, including returning  
 7 completed ballots by mail. Voting at home processes significantly reduce the obstacles to  
 8 voting by bringing the polling place to the voter rather than making the voter go to the polling  
 9 place.<sup>17</sup> An academic study of the 2020 election showed that sending every voter a mail ballot  
 10 increased turnout by an average of 5.6% over traditional in-person voting systems, with no  
 11 meaningful partisan impact.<sup>18</sup> The study also estimates that voting at home increases turnout  
 12 by around three to four percentage points,<sup>19</sup> as did another study conducted by in 2024.<sup>20</sup>

13  
 14 Certain voting groups are particularly helped by vote at home policies. An analysis of  
 15 the 2022 election showed that turnout for disabled voters increased from 2018 in states that  
 16 improved their access to mailed-out ballots compared to states that made no change.  
 17 Specifically, states that went from “excuse required” to “no excuse” absentee ballots saw a  
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 20 <sup>16</sup> Lisa Danetz, *Mail Ballot Sec. Features: A Primer*, Oct. 16, 2020,  
<https://www.brennancenter.org/our-work/research-reports/mail-ballot-security-features-primer> (and  
 21 citations therein) (noting this statistic is likely overly generous).

22 <sup>17</sup> Erin McGhee and Mindy Romero, *Vote-by-Mail Pol’y and the 2020 Pres. Elect., 11-16*, Last  
 revised Mar. 4, 2022. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3825939](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3825939).

23 <sup>18</sup> *Id.*

24 <sup>19</sup> *Id.*

25 <sup>20</sup> R. Michael Alvarez and Yimeng Li, *Univ’l Mail Ballot Del. Boosts Turnout: The Causal Effects of*  
 26 *Sending Mail Ballots to All Reg. Voters*, 22, July 2024, <https://voteathome.org/portfolio/universal-mail-ballot-delivery-boosts-turnout-the-causal-effects-of-sending-mail-ballots-to-all-registered-voters/>.

6.9% increase in turnout of disabled voters, while those went from “no excuse” to all vote by mail saw a 5.3% increase.<sup>21</sup> In 2020, when New Jersey automatically mailed ballots to all registered voters for the first time, it saw the highest turnout across the country for voters ages 18-29.<sup>22</sup> Vote at home states saw materially higher youth turnout across all racial subgroups.<sup>23</sup>

In the 2022 midterms, about 32 percent of all votes were cast through a vote at home process—a percentage that, with the exception of 2020 due to the COVID-19 pandemic, was a significant increase from prior years.<sup>24</sup>

### **B. An Election Day Received-by Deadline Would Increase Disenfranchisement**

At least sixteen states, including Washington and Oregon, plus Puerto Rico, the Virgin Islands, and Washington D.C., accept mail-in or absentee ballots if those ballots are postmarked on or before Election Day.<sup>25</sup> Washington has allowed an Election Day postmark since inception.<sup>26</sup> Oregon, the first state to use vote at home, started as a “received-by” state

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<sup>21</sup> Lisa Schur, et al., *Disability and Voter Turnout in the 2022 Elect's*, 6, last visited Jul. 18, 2025, [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.eac.gov/sites/default/files/2023-07/EAC\\_2023\\_Rutgers\\_Report\\_Supplement\\_FINAL.pdf](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.eac.gov/sites/default/files/2023-07/EAC_2023_Rutgers_Report_Supplement_FINAL.pdf).

<sup>22</sup> Ctr. for Info. & Rsch on Civic Learn. and Engag't, *St. by St. 2020 Youth Voter Turnout: The NE*, April 13, 2021, <https://circle.tufts.edu/latest-research/state-state-2020-youth-voter-turnout-northeast>.

<sup>23</sup> Nat'l Vote at Home Inst., *Vote at Home 2024 Pol'y and Rsch. Guide*, 23, (last updated Feb. 24, 2024).

<sup>24</sup> Charles Stewart III, *How We Voted in 2022: A Topical Look at the Surv. of the Perf. of Am. Elections*, 7, last visited Jul. 18, 2025, <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://electionlab.mit.edu/sites/default/files/2023-05/How-We-Voted-In-2022.pdf>.

<sup>25</sup> Nat'l Conf. of St. Legis's., *Table 11: Recp't. and Postmark Deadl's for Absentee/Mail Ballots*, (last updated April 24, 2025), <https://www.ncsl.org/elections-and-campaigns/table-11-receipt-and-postmark-deadlines-for-absentee-mail-ballots>.

<sup>26</sup> RCW 29A.40.110.

1 but in 2021 accepted ballots postmarked on Election Day.<sup>27</sup> Requiring these states to count  
 2 only ballots received by Election Day, rather than postmarked on Election Day, will  
 3 disenfranchise voters through no fault of their own.

4 In a recent letter to Postmaster General DeJoy, the National Association of State  
 5 Election Directors voiced alarm that local election officials from nearly every state have been  
 6 receiving ballots long after the three to five day period that USPS considers standard delivery  
 7 time for first-class mail.<sup>28</sup> The letter stated that election officials in multiple states reported  
 8 receiving dozens to hundreds of ballots 10 or more days after their postmark and warned that  
 9 “[t]here is no amount of proactive communication election officials can do to account for  
 10 USPS’s inability to meet their own service delivery timelines.”<sup>29</sup> In the 2024 general election,  
 11 Washington received 119,755 timely cast ballots after Election Day and Oregon received  
 12 13,596 such ballots.<sup>30</sup>

13 Rural voters could be disproportionately affected by an inability to vote by mail on  
 14 Election Day. Rural voters are more likely to use mail because, at least in Washington, the  
 15 prevalence of drop boxes in rural areas is less than in urban areas, as drop box placement is  
 16 based on population density. Washington State law requires a minimum of one ballot drop box  
 17 per fifteen thousand registered voters in the county and a minimum of one ballot drop box in  
 18 each city, town, and census-designated place in the county with a post office).<sup>31</sup> Moreover, the  
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22 <sup>27</sup> ORS 254.470(6)(e).

23 <sup>28</sup> Letter from the Nat'l Ass'n of St. El. Dir's to Hon. Postmst'r Louis DeJoy, Sept. 11, 2024.  
 24 <https://perma.cc/CJ7X-FLBN>.

25 <sup>29</sup> *Id.* at 1-2.

26 <sup>30</sup> Pl's Mot. for Summ. J., 3 and supporting declarations.

<sup>31</sup> RCW 29A.40.170(2)

1 USPS has recently engaged in cost-cutting efforts that it has expressly recognized will have  
 2 negative impacts on rural communities.<sup>32</sup> For example, in rural areas, unlike urban areas, mail  
 3 dropped off at post offices and collection boxes more than 50 miles from a regional hub is  
 4 collected the next day instead of the same day.<sup>33</sup> USPS standards for delivery times vary by  
 5 the distance that mail must travel to reach its destination, resulting in longer mailing times for  
 6 rural voters.<sup>34</sup> Thus, according to the Postal Regulatory Commission, “a higher percentage of  
 7 rural areas are affected by mail slowdowns than non-rural areas.”<sup>35</sup> In sum, while voters in  
 8 urban areas who have better access to drop boxes would be able to vote on Election Day itself,  
 9 voters in rural areas who live far from a drop box and rely on the mail to return their ballot  
 10 would have less time to vote and face greater risks of not having their vote counted if there is  
 11 delay.  
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13  
 14 No matter where they live, voters who vote on or before Election Day by filling out a  
 15 ballot and putting it in the mail should not risk disenfranchisement based on when their ballot  
 16 is received by election officials.  
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23 <sup>32</sup> Postal Reg. Comm'n, *Post. Serv. Impl's Nat'wide Changes to Mail Serv.*, (Apr. 29, 2025),  
 24 <https://www.prc.gov/postal-service-implements-nationwide-changes-mail-service>.

25 <sup>33</sup> *Id.*

26 <sup>34</sup> *Id.*

<sup>35</sup> *Id.*

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**III. CONCLUSION**

To make voting as convenient and accessible as possible and to avoid the disenfranchisement of voters, Amicus NVAHI respectfully asks the Court to grant Plaintiffs' Motion for Partial Summary Judgment.

Respectfully submitted,

DATED: July 21, 2025

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